



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

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2004 SEP 23 AM 9:48
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EPA REGION III PHILA, PA

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Elizabeth Hurtubise
Hovnanian Pennsylvania, Inc.
a/k/a K Hovnanian Developments of Pennsylvania, Inc.
301 Oxford Valley Road
Suite 1503
Yardley, PA 19067

Mr. Dennis LaRosa
Hovnanian Pennsylvania, Inc.
a/k/a K Hovnanian Developments of Pennsylvania, Inc.
301 Oxford Valley Road
Suite 804
Yardley, PA 19067

Registered agent, Hovnanian Pennsylvania, Inc.
1369 Troon Lane
West Chester, PA 19380-0000

Re: Administrative Order and Information Request

Enclosed are a copy of an Administrative Order issued this date pursuant to Section 309(a) of the Clean Water Act, (CWA or the Act) as amended, 33 U.S.C. § 1319(a), and a Request for Information, authorized under Section 308 of the Act.

ADMINISTRATIVE ORDER:

The Administrative Order contains a finding that Hovnanian Pennsylvania, Inc. has violated its CWA stormwater discharge permit at its construction site, Estates at Huntington Valley, in Lower Moreland Township, Pennsylvania.

You should carefully read the contents of the enclosed ORDER, and communicate to each responsible official, agent or employee the actions which each such person must take to ensure compliance with its terms. Failure to comply with the terms of the ORDER may result in further enforcement actions being taken, including a civil suit for penalties and injunctive relief, or a criminal prosecution, as appropriate.

In the event that your company may be a small business under the Small Business Regulatory Enforcement and Fairness Act (SBREFA), a copy of the SBREFA Fact Sheet is enclosed with this letter. This Fact Sheet provides information on contacting the SBREFA Ombudsman to comment on federal enforcement and compliance activities and also provides information on compliance assistance. As noted in the Fact Sheet, any decision to participate in such program or to seek compliance assistance does not relieve you of your obligation to respond in a timely manner to an EPA request or other enforcement action, create any new rights or defenses under law and will not affect EPA's decision to pursue this enforcement action. To preserve your legal rights, you must comply with all rules governing the administrative enforcement process. The Ombudsman and fairness boards do not participate in the resolution of EPA's enforcement action.

SECTION 308 INFORMATION REQUEST

The United States Environmental Protection Agency (EPA) is requiring certain information from Hovnanian Pennsylvania, Inc. (Hovnanian) in connection with its operations at its facilities. EPA is authorized under Section 308 of the CWA, to require monitoring reports and other information necessary to carry out the purposes of the CWA, including but not limited to:

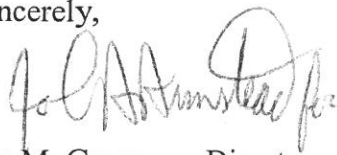
1. developing or assisting in the development of any effluent limitation, or other limitation, prohibition, effluent standard, pretreatment standard, or standard of performance under the CWA;
2. determining whether any person is in violation of any such effluent limitation, or other limitation, prohibition or effluent standard, pretreatment standard, or standard of performance;
3. fulfilling any requirement under Section 308; and
4. carrying out Sections 305, 311, 402, 404, 405, and 504 of the CWA.

Pursuant to Section 308 of the CWA, Hovnanian is directed to provide EPA the information described in the enclosure. The demand for information is directed to Hovnanian, and not any individual. This requirement to submit information is mandatory. It does not operate to resolve any liability for violations of the CWA. Hovnanian should be aware that failure to provide the information required or to provide misleading or false information may subject you to civil and criminal sanctions. The information provided may be used by EPA in administrative, civil or criminal proceedings.

Hovnanian may, if it desires, assert a business confidentiality claim covering all or part of the information required herein, in the manner described in 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent and by means of the procedures set forth in Subpart B, 40 C.F.R. Part 2. If no claim of confidentiality accompanies the information provided when it is received by EPA, it may be made available to the public by EPA without further notice to Hovnanian. This inquiry is not subject to review by the Office of Management and Budget under the Paperwork Reduction Act of 1980, 44 U.S.C. Chapter 35. (See 5 C.F.R. § 1320.3(c)).

If you require any information or assistance regarding the Administrative Order or the Request for Information, please contact Chuck Schadel at (215) 814-5761.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jon M. Capacasa", is written over a faint, circular official stamp.

Jon M. Capacasa, Director
Water Protection Division

Enclosures

cc: Jim Newbold, PADEP
Jesse Howe, Montgomery County
Conservation District



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

1650 Arch Street

Philadelphia, Pennsylvania 19103-2029

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REGIONAL HEARING CLERK
EPA REGION III PHILA, PA

IN THE MATTER OF:

Hovnanian Pennsylvania, Inc.
a/k/a K Hovnanian Developments
of Pennsylvania, Inc.
301 Oxford Valley Road
Suite 1503
Yardley, PA 19067

Docket No. CWA-03-2004-0264DN

FINDINGS OF VIOLATION
AND
ORDER FOR COMPLIANCE

I. STATUTORY AUTHORITY

1. This Order for Compliance is issued under the authority vested in the Administrator of the Environmental Protection Agency (hereinafter "EPA") under Section 309(a) of the Clean Water Act ("CWA" or "the Act"), 33 U.S.C. Section 1319(a). The Administrator has delegated this authority to the Regional Administrator of Region III, who in turn has delegated it to the Director of the Water Protection Division of Region III.

II. STATUTORY AND REGULATORY BACKGROUND

2. Section 301(a) of the Act, 33 U.S.C. § 1311(a), prohibits the discharge of any pollutants (other than dredged or fill material) from a point source into waters of the United States except in compliance with a permit issued pursuant to the National Pollutant Discharge Elimination System ("NPDES") program under Section 402 of the Act, 33 U.S.C. § 1342.
3. Section 402(a) of the Act, 33 U.S.C. § 1342(a), provides that the Administrator of EPA may issue permits under the NPDES program for the discharge of pollutants from point sources to waters of the United States. The discharges are subject to specific terms and conditions as prescribed in the permit.
4. An NPDES permit is required for discharges of storm water associated with "industrial activity." Section 402(p) of the Act, 33 U.S.C. § 1342(p); 40 C.F.R. § 122.26(a), 40 C.F.R. § 122.21.
5. "Storm water" is defined as "storm water runoff, snow melt runoff and surface runoff and drainage." *Id.* § 122.26(b)(13).

6. The term "industrial activity" includes, among others, "[c]onstruction activity including clearing, grading and excavation, except operations that result in the disturbance of less than five acres of total land area. Construction activity also includes the disturbance of less than five acres of total land area that is a part of a larger common plan of development or sale if the larger common plan will ultimately disturb five acres or more[.]" 40 C.F.R. § 122.26(b)(14)(x).

II. FINDINGS OF VIOLATION

7. Upon information and belief, Hovnanian Pennsylvania, Inc., a/k/a K Hovnanian Developments of Pennsylvania, Inc., ("Hovnanian" or "Respondent") is a corporation doing business in Pennsylvania through its subsidiary. As a corporation, Hovnanian is a "person" as that term is defined at Section 502(5) of the Act, 33 U.S.C. § 1362(5) and 40 C.F.R. § 122.2.
8. Respondent, at all times relevant to this Complaint, has owned and operated a construction site, located on Pine Road, Lower Moreland Township, Montgomery County, Pennsylvania. This site is known as The Estates at Huntingdon Valley (hereinafter, "the Site" or "EHV").
9. The operations conducted by Hovnanian at the Site consisted of construction activity, including, clearing, grading and/or excavation in a total land area of about 48 acres.
10. Storm water discharges flow and, at all times relevant to this Complaint, have flowed, from the Site to a tributary of Huntingdon Valley Creek.
11. The tributary of Huntingdon Valley Creek and the tributary of Poquessing Creek to which storm water from the Site discharges, are a "water of the United States" as that term is defined at 40 C.F.R. § 122.2.
12. Pursuant to section 402(b) of the Act, 33 U.S.C. § 1342(b), EPA authorized the Commonwealth of Pennsylvania ("PA") to issue NPDES permits in 1978. In 1991 EPA authorized PA to issue General NPDES Permits.
13. On October 1997, PA Department of Environmental Protection (DEP) issued a five-year NPDES General Permit for Discharges of Stormwater Associated with Construction Activities (PAG-2). DEP reissued PAG-2 on December 2002.
14. On October 2000, Respondent submitted a Notice of Intent to seek coverage for the Site under NPDES General Permit PAG-2.

15. Pursuant to Sections 402(a) and 402(p) of the Act, 33 U.S.C. §§ 1342(a) and (p), DEP approved coverage of the Site under NPDES General Permit PAG-2, permit # PAR10T682 ("the Permit") to the Respondent on or about July 29, 2002.
16. The Permit authorizes discharges of storm water from the Site to a tributary of Huntingdon Valley Creek, but only in accordance with the conditions of the permit.
17. The Permit requires the permittee to, among other things, develop an Erosion and Sedimentation Control Plan ("the E&S Plan") identifying erosion and sedimentation control measures ("BMPs," or "Best Management Practices") to control runoff from the Site, and protect and maintain surface waters.
18. The Permit requires the permittee to install, operate and maintain the BMPs identified in the E&S Plan. Upon loss or failure of the BMPs, the Permit requires the permittee to immediately restore the BMP or provide another alternative.
19. The Permit requires that the permittee follow the staging of earth disturbance activities contained in the E&S Plan.
20. The Respondent developed and submitted an E&S Plan identifying Best Management Practices ("BMPs") in order to comply with the conditions of Permit # PAR10T682.
21. The E&S Plan was approved by Montgomery County Conservation District (MCCD) on July 29, 2002.
22. The E&S Plan requires that: all erosion and sedimentation measures must be maintained properly until the Site is stabilized; all maintenance work such as reseeding, remulching, repair and replacement must be performed immediately; stockpiles, sediment basins and channels must be stabilized immediately; disturbed areas on which activity will ceased and which will remain exposed be stabilized immediately; and stormwater inlets must be protected until their drainage area is stabilized.
23. The E&S Plan establishes a sequence of construction. Under the sequence, all erosion and sediment controls must be constructed and functional before site disturbance within those areas. The Sequence provided for the installation of a rock construction entrance, the construction of sediment basins, the installation of tree protection fencing and other fencing, and the construction of the roadway diversion berm before clearing, stripping and construction in the Site.
24. On January 21st, 2003, personnel from the MCCD visited and inspected the facility. Clearing, earthmoving and site disturbance was apparent at the site. During the inspection, MCCD noted the following violations:

- a. Respondent failed to properly maintain the rock construction entrance into the Site and it needed to be reinstalled in accordance with the specifications in the E&S Plan.
 - b. Respondent failed to maintain or replace silt fencing along Pine Road as required by the E&S Plan.
 - c. Respondent failed to install silt fencing in the area behind lot #10 as required by the E&S Plan.
 - d. Respondent failed to install the roadway diversion berm up slope from the construction entrance into the site as required by the E&S Plan.
 - e. Respondent failed to install an emergency spillway for Sediment Basin #1 as required by the E&S Plan.
25. On March 19, 2003, personnel from MCCD visited and inspected the facility. Clearing, earthmoving and site disturbance was apparent at the site. During the inspection, MCCD noted the following violations:
- a. Respondent did not have silt fencing in place along Pine Road as required by the E&S Plan.
 - b. Respondent failed to install inlet protection at the 2 inlets near the Pine Road entrance, as required by the E&S Plan.
 - c. Respondent failed to install perimeter filter fabric fence and to immediately apply temporary seeding and mulching to two (2) stockpiles, as required by the E&S Plan.
26. On February 23, 2004, EPA representatives visited and inspected the facility. Clearing, earthmoving and site disturbance was apparent throughout the site. During the inspection, EPA noted the following violations:
- a. Respondent had failed to install and/or maintain fencing around four (4) stockpiles, as required by the E&S Plan.
 - b. Respondent had failed to install tree protection fencing around any of the Tree Protection" areas identified for protection in the E&S Plan.
 - c. Respondent had failed to construct Sediment Basin #2, are required by the E&S Plan.

- d. Respondent had failed to stabilize disturbed areas on which activity had ceased and which remained exposed along the southwestern embankment of Sediment Basin #1, as required by the E&S Plan
- 27. On March 9, 2004, MCCD personnel visited and inspected the facility. Clearing, earthmoving and site disturbance was apparent throughout the site. During the inspection, MCCD noted that Respondent had not yet installed Sediment Basin #2.
- 28. By failing to installed and/or maintained the Best Management Practices required by the E&S Plan as described above, Respondent violated its Permit and the Clean Water Act.

III. ORDER

AND NOW, this 23rd day of September, 2004, Respondent is hereby ORDERED, pursuant to Section 309(a) of the Act, 33 U.S.C. Section 1319(a), to do the following:

- 29. Within thirty (30) days of the effective date of this Order, Respondent shall:
 - a. appropriately delineate and protect all tree protection areas in accordance with the E&S Plan, and restore any damaged tree protection areas, including replanting of trees to replaced any damaged trees;
 - b. manage all stockpiles in the Site as required by the E&S Plan;
 - c. seed and stabilize all slopes leading to Sediment Basin in accordance with the E&S Plan; and
 - d. ensure that Sediment Basin #2 has been completely and properly constructed in accordance with the E&S Plan, with temporary sediment controls and rock rip-rap protection, and that the area around Basin #2 have been seeded and stabilized.
 - e. comply with all the terms and conditions of the Permit, including fully implementing the E&S Plan; properly operating and maintaining all BMPs in the E&S Plan; inspecting the site regularly and after each precipitation event to ascertain that BMPs are effective and operational; and restoring BMPs upon loss or failure.
 - f. submit a certification concerning Respondent's actions to comply with this Amended Order to the following individual:

Charles Schadel
U.S. EPA, Region III, (3WP31)
1650 Arch Street
Philadelphia, PA 19103-2029
(215)814-5761

The certification shall be signed by a responsible corporate officer, as defined in 40 CFR § 122.22, and shall read as follows: "I certify under penalty of law that this submission is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."


IV. GENERAL PROVISIONS

30. Issuance of this Order shall not be deemed an election by EPA to forego any administrative, civil, or criminal action to seek penalties, fines, or any other appropriate relief under the Act for the violations cited herein. EPA reserves the right to seek any remedy available under the law that it deems appropriate for the violations cited. Failure to comply with this Order or the Act may result in a civil judicial action initiated by the U.S. Department of Justice. If EPA initiates such an action, Respondent will be subject to civil penalties of up to \$32,500 per day of violation pursuant to 33 U.S.C. § 1319 and 40 C.F.R. Part 19.
31. If a criminal judicial action is initiated, and Respondent is convicted of a criminal offense under Section 309 of the Act, Respondent may be subject to a monetary fine and/or imprisonment, and may become ineligible for certain contracts, grants, or loans under Section 508 of the Act.
32. Respondent shall permit EPA or its authorized representative to inspect any site at reasonable times to confirm that Respondent is in compliance with this Order and with any applicable permit. EPA reserves all existing inspection authority.
33. This Order does not constitute a waiver or modification of the terms or conditions of any NPDES permit. Compliance with the terms and conditions of this Order does not relieve the Respondent of its obligations to comply with any applicable federal, state, or local law or regulation.
34. Violation of the terms and conditions of this ORDER constitutes an additional violation of the Act, and may result in a civil action for injunctive relief and/or a penalty not to exceed \$32,500 per day of such violation, pursuant to Sections 309(b) and (d) of the Act, 33 U.S.C. Section 1319(b) and (d). In addition, Section 309(c) provides criminal sanctions for knowing or negligent violations of the Act including imprisonment and fines of up to \$50,000 per day of violation.

V. EFFECTIVE DATE

This ORDER is effective upon receipt.

Date: SEP 23 2004



Jon M. Capacasa, Director
Water Protection Division
EPA, Region III

Information for Small Businesses

If you are small business as defined by the Small Business Administration (defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), below is information you may find helpful.

The United States Environmental Protection Agency (EPA) offers small businesses a wide variety of compliance assistance resources and tools designed to assist businesses to comply with federal and state environmental laws. These resources can help businesses understand their obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

Websites

EPA offers a great deal of compliance assistance information and materials for small businesses on the following Websites, available through public libraries:

⇒ www.epa.gov	<i>EPA's Home Page</i>
⇒ www.smallbiz-enviroweb.org	<i>EPA's Small Business Home Page</i>
⇒ www.smallbiz-enviroweb.org/state.html	<i>List of State Contacts</i>
⇒ www.epa.gov/ttn/sbap	<i>Small Business Assistance Programs</i>
⇒ www.epa.gov/oeca/polguid/index.html	<i>Enforcement Policy and Guidance</i>
⇒ www.epa.gov/oeca/smbusi.html	<i>Small Business Policy</i>
⇒ www.epa.gov/oeca/oc	<i>Compliance Assistance Home Page</i>
⇒ www.epa.gov/oeca/ccsmd/commpull.html	<i>Small Businesses and Commercial Services</i>
⇒ www.epa.gov/oeca/ccsmd/mun.html	<i>Small Communities Policy</i>

Hotlines

EPA sponsors approximately 89 hotlines and clearinghouses that provide free and convenient avenues to obtain assistance with environmental requirements. EPA's Small Business Ombudsman Hotline can provide you with a list of all the hot lines and assist you with determining which hotline will best meet your needs. Key hotlines that may be of interest to you include:

⇒ EPA's Small Business Ombudsman.....	(800) 368-5888
⇒ RCRA/UST/CERCLA Hotline.....	(800) 424-9346
⇒ Toxics Substances and Asbestos Information.....	(202) 554-1404
⇒ Safe Drinking Water.....	(800) 426-4791
⇒ Stratospheric Ozone/CFC Information.....	(800) 296-1996
⇒ Clean Air Technical Center.....	(919) 541-0800
⇒ Wetlands Hotline.....	(800) 832-7828

Compliance Assistance Centers

EPA has established national compliance assistance centers, in partnership with industry, academic institutions, and other federal and state agencies, that provide on line and fax back assistance services in the following sectors heavily populated with small businesses:

- ⇒ Access to All Centers (www.epa.gov/oeca/mfcac.html)

INFORMATION REQUIRED UNDER CWA SECTION 308

Hovnanian Pennsylvania, Inc.

A. INSTRUCTIONS

1. Provide a separate response to each question and subpart of a question set forth below.
2. Identify each person responding to any of the questions on behalf of Hovnanian Pennsylvania a/k/a K Hovnanian Developments of Pennsylvania, Inc. (Hovnanian), as well as each person consulted in the preparation of a response.
3. For each question, identify each document consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question, and provide a true and correct copy of each such document if not provided in response to another specific question.
4. Indicate on each document produced in response to any of the questions, the number of the question to which it corresponds.
5. If the required information or documents are not known or available to Hovnanian at the time of the response to this information demand, but later becomes known or available, Hovnanian must supplement its response to the Environmental Protection Agency (EPA). Moreover, should Hovnanian find, at any time after submission of its response, that any portion is or becomes false, incomplete, or misrepresents the facts, Hovnanian must provide EPA with a corrected response as soon as possible.
6. If any question cannot be answered in full, answer to the extent possible. If your responses are qualified in any manner, please explain.
7. All submissions provided, pursuant to this Section 308 demand, shall be signed by a duly authorized agent of Hovnanian and include the following certification:

"I certify that the information contained in or accompanying this submission is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

B. DEFINITIONS

1. The terms "document" and "documents" mean any format that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hard copy, including any form or format of these types. If in computer format or memory, each such document shall be provided in a translated form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include: a) a copy of

each document which is not an exact duplicate of a document which is provided; b) each copy which has any writing, notation, or the like on it; c) drafts; d) attachments to or enclosures with any document; and e) every other document referred to or incorporated into each document.

2. "Relate to" and "relating to" mean discuss, describe, refer to, reflect, contain, analyze, study, report on, comment on, evidence, comprise, constitute, set forth, consider, recommend, concern, allude or pertains to, in whole or in part.

C. INFORMATION REQUIRED

Pursuant to Section 308 of the Clean Water Act, 33 U.S.C. § 1318, please provide the following required information. The questions shall be deemed to seek information for the time period of January 2003 to present, unless a particular question specifies a different time period.

1. Provide the legal name of Hovnanian Pennsylvania, Inc. and any all related business entities doing business in Delaware, the District of Columbia, Maryland, Pennsylvania, Virginia or West Virginia. Specify the relationship of Hovnanian Pennsylvania, Inc. to each business. In particular, describe the relationship between Hovnanian Pennsylvania Inc., and K Hovnanian Companies and Hovnanian Enterprises, Inc.
2. Name the corporate officers of Hovnanian Pennsylvania, Inc., and of any parent corporation, for the time period of January 2003 to present.
3. Provide a true copy of any Notice of Intent to submitted by Hovnanian Pennsylvania, Inc. or any related business entity to the Pennsylvania Department of Environmental Protection (DEP) or to the Montgomery County Conservation District, at any point from January 2000 to the present, to seek authorization under General Permit for Discharges of Stormwater Associated with Construction Activities (PAG-2) for stormwater discharges from the Estates and Huntingdon Valley site.
4. Provide a true copy, with all attachments, of the PAG-2 Permit No. PAR10T682, issued to Hovnanian Pennsylvania, Inc. or any related business entity by the Pennsylvania Department of Environmental Protection, to authorize stormwater discharges from the Estates and Huntingdon Valley site, and which applied to the site from January 2003 to the present.
5. Provide a true copy, with all attachments including any narrative and sheets, of the Erosion & Sedimentation Control Plan prepared for the Estates and Huntingdon Valley site, as required by PAG-2 Permit No. PAR10T682, and which was in effect on January 2003 to the present. If the Plan has been revised since January 2003, also provide the revised Plan and specify the applicability of the revisions.

IV. GENERAL PROVISIONS

1. Issuance of this Order shall not be deemed an election by EPA to forego any administrative, civil, or criminal action to seek penalties, fines, or any other appropriate relief under the Act for the violations cited herein. EPA reserves the right to seek any remedy available under the law that it deems appropriate for the violations cited. Failure to comply with this Order or the Act may result in a civil judicial action initiated by the U.S. Department of Justice. If EPA initiates such an action, Respondent will be subject to civil penalties of up to \$32,500 per day of violation pursuant to 33 U.S.C. § 1319 and 40 C.F.R. Part 19.
2. If a criminal judicial action is initiated, and Respondent is convicted of a criminal offense under Section 309 of the Act, Respondent may be subject to a monetary fine and/or imprisonment, and may become ineligible for certain contracts, grants, or loans under Section 508 of the Act.
3. Respondent shall permit EPA or its authorized representative to inspect any site at reasonable times to confirm that Respondent is in compliance with this Order and with any applicable permit. EPA reserves all existing inspection authority.
4. This Order does not constitute a waiver or modification of the terms or conditions of any NPDES permit. Compliance with the terms and conditions of this Order does not relieve the Respondent of its obligations to comply with any applicable federal, state, or local law or regulation.
5. Violation of the terms and conditions of this ORDER constitutes an additional violation of the Act, and may result in a civil action for injunctive relief and/or a penalty not to exceed \$32,500 per day of such violation, pursuant to Sections 309(b) and (d) of the Act, 33 U.S.C. Section 1319(b) and (d). In addition, Section 309(c) provides criminal sanctions for knowing or negligent violations of the Act including imprisonment and fines of up to \$50,000 per day of violation.

V. EFFECTIVE DATE

This ORDER is effective upon receipt.

Date: _____

Jon M. Capacasa, Director
Water Protection Division
EPA, Region III

CONCURRENCES							
SYMBOL	3WP31	3RC20	3WP31	3WP30	3WP00		
Surname	C. Schadel	ORC	A. McFadden	D. McGuigan	J. Capacasa		
	9/16/09	9/16/09	9/17/09	9/20/09	9/21/09		

Delivery by hand (original and 1 copy):

Regional Hearing Clerk (3RC00)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Date: 9/23/04



Chuck Schadel
Office of Compliance & Enforcement (3WP31)
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029